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Atorneys for Defendant Jeffrey Harrison

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

JEFFREY HARRISON,

Defendant.

Case No. CR-07-0594 PJH

**DECLARATION OF EDWIN K.
PRATHER IN SUPPORT OF
DEFENDANT'S APPLICATION FOR
ORDER SHORTENING TIME FOR
HEARING ON MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

Date: January 17, 2008
Time: 9:30 a.m.
Judge: Hon. James Larson

I, EDWIN PRATHER, declare the following:

1. I am an attorney at law licensed to practice in the State of California and an attorney of record for the defendant Jeffrey Harrison in the above-captioned case. I make this declaration in support of Mr. Harrison's Application for Order Shortening Time for Hearing on Motion to Modify Conditions of Pretrial Release. I have personal knowledge of the following facts and, if called upon to do so, I could and would competently testify thereto.

2. On January 10, 2008, I spoke with Assistant United States Attorney Denise Barton regarding this matter. Ms. Barton agreed the Government would not oppose this Application for Order Shortening Time, and further agreed that she would be prepared to

respond to the underlying motion on January 17, 2008.

3. On January 10, 2008, I spoke with Rich Sarlatte, Mr. Harrison's Pretrial Services Officer, and alerted Mr. Sarlatte to the underlying motion and to our request to have the motion heard on January 17, 2008. Mr. Sarlatte agreed he was available for such a hearing on that date.

4. Defendant's motion must be heard on shortened time because the requested modification of pretrial release conditions is related to meetings scheduled for the week of January 20, 2008 in the Philippines.

5. The meetings are a final effort to avoid the collapse of Global Mobile Technologies (GMT) by transitioning to a new executive leadership team and introducing that team to prospective customers and business partners of GMT. To date, GMT has been the recipient of over \$7,000,000 of investment capital.

Dated: January 10, 2008

Respectfully submitted,

/s/: Edwin K. Prather
EDWIN K. PRATHER
Clarence & Dyer LLP
Attorneys for Jeffrey Harrison

1 Proof of Service

2 I, Abbie Chin, declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business address
4 is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San
Francisco.

5 On January 11, 2008, I served a copy, with all exhibits, of the following documents:

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7 • **DECLARATION OF EDWIN K. PRATHER IN SUPPORT OF
DEFENDANT'S APPLICATION FOR ORDER SHORTENING TIME FOR HEARING
ON MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

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10 ____X____ (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C
11 ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All
12 pleadings and papers must be electronically served in accordance with those Rules or General
13 Orders with email address(es) as noted below:

14 **Denise Marie Barton**

15 United States Attorney's Office
450 Golden Gate Avenue, 11th Floor
Box 36055
16 San Francisco, CA 94102
415-436-7359
17 Fax: 415-436-7234
Email: denise.barton@usdoj.gov

18

19 I declare under penalty of perjury under the laws of the state of California that the
foregoing is true and correct and that this declaration was executed on the above stated date.
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22 /s/: Abbie Chin
Abbie Chin

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